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7 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
8

9 UNITED STATES OF AMERICA,

2:22-CR-083-RFB-NJK

10 Plaintiff,

**Stipulation for Entry of Order of
Forfeiture as to Faye M. Wynhoff and
Order**

11 v.

12 JAMES ALLEN WYNHOFF,

13 Defendant,

14 FAYE M. WYNHOFF,

15 Third-Party Petitioner.

16 The United States of America and Faye M. Wynhoff, Pro Se Petitioner, agree as
17 follows:

18 1. As part of his guilty plea (ECF No. 29), James Allen Wynhoff agreed to the
19 forfeiture of property set forth in the Plea Agreement and the Forfeiture Allegations of the
20 Criminal Information, namely:

21 A. the black Samsung cellular phone, model galaxy SM-A125U, bearing IMEI
22 357816336078892 ("Samsung Galaxy cellphone");

23 B. the black consumer ZTE cellular phone, model Z2335CC, bearing IMEI
24 862674048086200, serial number 320217160172 ("ZTE cellphone")

25 C. the gold LG cellular phone, Model SP200, MEID 089086362503364392, Serial
26 Number 801VTJH0348828 ("LG cellphone"); and

27 D. the black Lenovo laptop, Model 20251, Serial Number AB20181919, with device
28 ID F0F121F9-9892-4A74-A7F9-FA0EC780EB77 ("Lenovo laptop").

1 (property).

2 2. The government served Faye M. Wynhoff with the Preliminary Order of
3 Forfeiture and the Notice. Preliminary Order of Forfeiture, ECF No. 31; Notice of Filing
4 Service of Process – Mailing, ECF No. 32.

5 3. On October 28, 2022, Faye M. Wynhoff filed a petition requesting an ancillary
6 hearing concerning the above-listed Lenovo laptop and Samsung Galaxy cellphone. ECF
7 No. 33.

8 4. The government met with Faye M. Wynhoff and provided her family pictures,
9 personal information, and documents that were reasonably segregable, economically and
10 electronically, from the illegal material on the Lenovo laptop.

11 5. The government also returned the Samsung Galaxy cellphone and ZTE cellphone
12 to Faye M. Wynhoff after completing factory resets on both.

13 6. At this time, Faye M. Wynhoff knowingly and voluntarily agrees to the criminal
14 forfeiture to the United States of the following:

15 A. the LG cellphone, and

16 B. the Lenovo laptop.


17 7. Faye M. Wynhoff knowingly and voluntarily agrees to relinquish all possessory
18 rights, ownership rights, and all rights, titles, and interests in the LG cellphone and the
19 Lenovo laptop, including her rights to any ancillary hearings, service of process, and notice.

20 8. Faye M. Wynhoff knowingly and voluntarily agrees not to file any claim, answer,
21 petition, or other documents in any hearing concerning the LG cellphone and the Lenovo
22 laptop. Faye M. Wynhoff knowingly and voluntarily agrees to withdraw any claim, answer,
23 counterclaim, petition, or other documents she has filed in any hearing concerning this case.

24 IT IS HEREBY CERTIFIED, under 28 U.S.C. § 2465(a)(2), that there was
25 reasonable cause for the seizure and forfeiture of the LG cellphone and the Lenovo laptop.

26 IT IS ORDERED that Faye M. Wynhoff's petition (ECF No. 33) is hereby
27 withdrawn.
28

1 DATED: 12-30-2022

2 
3 FAYE M. WYNHOFF
4 Petitioner

DATED: 1/3/2023

JASON M. FRIERSON
United States Attorney


SUPRIYA PRASAD
Assistant United States Attorney

IT IS SO ORDERED:


RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: January 3, 2023